

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

DISPLAY TECHNOLOGIES, LLC,

Plaintiff,

v.

**RICOH AMERICAS CORPORATION, *et
al.*,**

Defendants.

Civil Action No. 2:15-cv-1631-JRG-JRP

CONSOLIDATED LEAD CASE

JURY TRIAL DEMANDED

JOINT MOTION TO DISMISS

Plaintiff Display Technologies, LLC (“Plaintiff”), and Defendant C&A IP Holdings, LLC (“Defendant”), pursuant to Fed. R. Civ. P. 41(a)(2) and (c), hereby move for an order dismissing Plaintiff’s claims in this action against Defendant WITH PREJUDICE and Defendant’s counterclaims WITH PREJUDICE, with each party to bear its own costs, expenses, and attorneys’ fees.

DATED April 21, 2016.

Respectfully submitted,

/s/ Neal Massand
Hao Ni
Texas Bar No. 24047205
hni@nilawfirm.com
Timothy T. Wang
Texas Bar No. 24067927
twang@nilawfirm.com
Neal G. Massand
Texas Bar No. 24039038
nmassand@nilawfirm.com
Stevenson Moore V
Texas Bar No. 24076573
smoore@nilawfirm.com
Krystal L. McCool
Texas Bar No. 24082185
kmccool@nilawfirm.com

NI, WANG & MASSAND, PLLC
8140 Walnut Hill Ln., Ste. 500
Dallas, TX 75251
Tel: (972) 331-4600
Fax: (972) 314-0900

**ATTORNEYS FOR PLAINTIFF
DISPLAY TECHNOLOGIES, LLC**

By: /s/ Russell E. Levine, P.C.
Russell E. Levine, P.C.
(Illinois State Bar No. 6193834)
russell.levine@kirkland.com
KIRKLAND & ELLIS LLP
300 North LaSalle Street
Chicago, IL 60654
(312) 862-2000

**ATTORNEY FOR DEFENDANT
C&A IP HOLDINGS, LLC**

CERTIFICATE OF SERVICE

I hereby certify that on the 21st day of April, 2016, I electronically filed the foregoing document with the clerk of the court for the U.S. District Court, Eastern District of Texas, Marshall Division, using the electronic case filing system of the court. The electronic case filing system sent a “Notice of Electronic Filing” to the attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means.

/s/ Neal Massand
Neal Massand